

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

| | | |
|--------------------------|---|------------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Criminal No. 19-cr-10063-DJC |
| |) | |
| RANDALL CRATER, |) | |
| |) | |
| Defendant |) | |

GOVERNMENT’S PROPOSED VOIR DIRE

The United States of America hereby requests that, in addition to those questions commonly put to the venire in cases commenced in this Court, the Court pose the following questions to the prospective jurors in this case:

Questions Identifying Bias Against the Government

1. The United States of America is one of the parties in this trial. You will hear the United States referred to throughout the trial as “the government.” Have you, or any member of your immediate family, or anyone with whom you are close:
 - (a) ever been employed by the federal or state government in any capacity?
 - (b) ever filed a lawsuit or claim of any kind against the United States or any of its agencies, or answered a claim or lawsuit filed by the federal government?
2. Do you have any beliefs or feelings regarding the federal or state government that would affect your ability to evaluate and judge fairly and impartially the facts of this case?
3. Have you, any member of your immediate family, or anyone with whom you are close, ever been involved in a criminal proceeding in any way, including as a defendant, victim, witness, or juror?
4. Have you, any member of your immediate family, or anyone with whom you are close, ever been involved in any type of legal proceeding in any way, including civil proceedings?

5. Do you have any concerns about the criminal justice system that would make it difficult for you to be a juror in this case?
6. Some of the witnesses that may be called by the United States at trial are employed by the United States Postal Service (“USPS”) and the Federal Bureau of Investigation (“FBI”). Have you, or any member of your immediate family, or anyone with whom you are close, ever had any involvement, of any sort, with USPS or FBI or any other law enforcement agency, including state and local police?
7. Do you have any beliefs or feelings regarding such law enforcement witnesses that would affect your ability to evaluate and judge fairly and impartially their testimony or the facts of this case?
8. Do you have any beliefs or feelings regarding law enforcement in general that would affect your ability to evaluate and judge fairly and impartially their testimony or the facts of this case?
9. Hollywood produces television programs and movies about crimes and crime-solving police work that can create unrealistic expectations about how police work is done in a real case and about evidence in a real case in a court of law. While entertaining, such programs and movies should not be used to set standards or expectations about how crime is investigated in the real world and how matters are proved in a real court of law. Is there anyone who could *not* put aside such expectations and return a true verdict based only on the evidence presented in this courtroom?

Questions Identifying Experience with Virtual Currencies

10. Do you have any opinions or feelings about virtual currency or cryptocurrency? Would those opinions or feelings affect your ability to evaluate and judge fairly and impartially the testimony or the facts of this case?
11. Do you currently or have you previously owned, sold, promoted, or been otherwise involved with virtual currency or cryptocurrency? Have your experiences with virtual currency or cryptocurrency affect your ability to evaluate and judge fairly and impartially the testimony or the facts of this case?
12. Have you ever been accused of making a misstatement of fact, or defrauding an individual, in relation to your business? If so, would that experience affect your ability to evaluate and judge fairly and impartially the testimony or the facts of this case?